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9 Geron Corporation, John A. Scarlett, Olivia K. Bloom, and Stephen M. Kelsey

10 [Additional counsel listed on signature page]

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13
14 In re: GERON CORPORATION SECURITIES
15 LITIGATION

16 CA No. 3:14-CV-01224 (CRB)

17 **STIPULATION AND ORDER TO
MODIFY CASE MANAGEMENT
SCHEDULE**

18 This Document Relates To:

Judge: Hon. Charles R. Breyer
Courtroom: 6, 17th Floor

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ALL ACTIONS

CONSOLIDATED CLASS ACTION

1 Lead Plaintiff Vinod Patel (“Lead Plaintiff”) and Defendants Geron Corporation, John A.
2 Scarlett, Olivia K. Bloom, and Stephen M. Kelsey (collectively “Defendants” and together with
3 Lead Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

4 WHEREAS, on November 6, 2015, the Parties filed their Joint Case Management Statement
5 and Order (the “Initial CMS”) (ECF No. 94) proposing a litigation schedule and discovery plan for
6 this action;

7 WHEREAS, on November 13, 2015, the Court expressly adopted certain dates set forth in
8 the Initial CMS, and, although not reflected in the Minute Entry (ECF No. 95), presumably
9 approved the remaining dates set forth in the Initial CMS;

10 WHEREAS, on June 9, 2016, the Court entered an order modifying certain dates set forth in
11 the Initial CMS (ECF No. 101) (the “Modified Scheduling Order”);

12 WHEREAS, the Parties engaged in informal, targeted discovery and attempted to resolve
13 the dispute amicably, but have been unable to do so to date;

14 WHEREAS, on July 8, 2016, Lead Plaintiff served discovery on Defendants, including
15 requests for the production of documents;

16 WHEREAS, Defendants intend to serve discovery on Lead Plaintiff, including requests for
17 the production of documents;

18 WHEREAS, the Parties have met and conferred and agreed to a new case management
19 schedule that would extend the time for the Parties to substantially complete their respective
20 document productions by approximately one month; and

21 WHEREAS, this one month extension for the Parties to substantially complete their
22 respective document productions would not alter any other dates set forth in the Modified
23 Scheduling Order;

24 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED that,

25 1. The following amended case management schedule should be adopted and the dates
26 highlighted in the chart below should replace the dates set forth in the Modified Scheduling Order:

1	EVENT	DATE
2	Exchange of initial disclosures	December 11, 2015
3	Plaintiff to file class certification motion	August 12, 2016
4	Deadline for substantial completion of document productions	<i>October 31, 2016</i>
5	Defendants to respond to Plaintiff's class certification motion	September 26, 2016
7	Plaintiff's reply in support of class certification motion	November 7, 2016
9	Hearing on Plaintiff's class certification motion	December 2, 2016, or on a date set by the Court
10	Fact discovery cut-off	February 24, 2017
11	Last day to amend pleadings or add parties	March 10, 2017
12	Deadline for Plaintiff to submit expert reports	April 7, 2017
13	Deadline for Defendants to submit expert reports	May 8, 2017
14	Deadline for Plaintiff to submit rebuttal expert reports, if any	June 7, 2017
15	Expert discovery cut-off	June 23, 2017
16	Defendants to file motion for summary judgment and/or summary adjudication	July 14, 2017
18	Plaintiff's to respond to Defendants' motion for summary judgment and/or summary adjudication	August 28, 2017
20	Defendants reply in support of Defendants' motion for summary judgment and/or summary adjudication	October 12, 2017
22	Last day to conduct settlement conference	No later than 25 days after Court's ruling on all dispositive motions
24	Deadline to serve and file Rule 26(a)(3) disclosures	No later than 30 days after Court's ruling on all dispositive motions
25	Deadline to serve motions <i>in limine</i>	No later than 30 days after Court's ruling on all dispositive motions
27	Deadline to serve oppositions to motions <i>in limine</i>	No later than 60 days after Court's ruling on all dispositive motions
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1	Deadline for the Parties to exchange copies of all exhibits, summaries, charts, and diagrams to be used at trial other than solely for impeachment	No later than 60 days after Court's ruling on all dispositive motions
3	Deadline to file joint proposed final pretrial order and other materials as set forth in the Court's "Guidelines for Trial and Final Pretrial Conference in Civil Jury Cases"	No later than 73 days after Court's ruling on all dispositive motions
6	Pre-trial conference	No later than 80 days after Court's ruling on all dispositive motions
8	Trial to commence	No later than 90 days after Court's ruling on all dispositive motions

10 Dated: July 28, 2016

COOLEY LLP

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19 *Attorneys for Defendants Geron Corporation,
 20 John A. Scarlett, Olivia K. Bloom,
 21 and Stephen M. Kelsey*

22 Dated: July 28, 2016

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Attorneys for Lead Plaintiff

1
ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

2
In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
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document has been obtained from the signatory.

4
Dated: July 28, 2016

FARUQI & FARUQI, LLP

6
/s/ Ryan E. Blair
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Ryan E. Blair (246724)

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Attorneys for Defendants

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* * *

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ORDER

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Pursuant to the foregoing stipulation, and good cause appearing, **IT IS SO ORDERED.**

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DATED: July 29, 2016

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Honorable Charles R. Breyer
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United States District Judge

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